

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

AON PLC and AON GROUP, INC.,

Plaintiffs,

v.

INFINITE EQUITY, INC., TERRY  
ADAMSON, JON BURG, DANIEL  
COLEMAN, ELIZABETH STOUDT, and  
TYLER EVANS,

Defendants.

Case No. 1:19-cv-07504

Honorable John F. Kness

Magistrate Judge Sunil R. Harjani

**DEFENDANTS INFINITE EQUITY, INC., JON BURG, DANIEL COLEMAN,  
ELIZABETH STOUDT AND TYLER EVANS'  
MOTION FOR LEAVE TO FILE SUR-REPLY**

Defendants Infinite Equity, Inc., Jon Burg, Daniel Coleman, Elizabeth Stoudt, and Tyler Evans (“Defendants”), by and through their attorneys, Perkins Coie LLP, hereby move this court for leave to file a sur-reply in support of their Response to Plaintiffs’ Motion for Clarification Regarding Consent Order Deadline, and in support of such motion state as follows:

As explained in greater detail in the proposed Sur-Reply (attached as Exhibit A), in their Reply in Support of their Motion for Clarification Regarding Consent Order Deadline (“Reply”) (Dkt. No. 93), Plaintiffs Aon PLC and Aon Group, Inc. improperly raise new arguments based on new case law and incorporate an entirely new (misleading and unsupported) facts section. In addition, Plaintiffs’ Reply is replete with misstatements and misapplications of the law.

A sur-reply is warranted so Defendants may be heard on these points and so the Court may have the necessary information to make an informed decision on the pending motion. *See University Healthsystem Consortium v. UnitedHealth Group, Inc.*, 68 F. Supp. 3d 917, 922 (N.D. Ill. 2014) (granting leave to file sur-reply when movant’s reply brief raised new arguments and

mischaracterized prior arguments). The decision whether to grant leave to file a sur-reply is within the Court's discretion. *Id.* Accordingly, Defendants respectfully request leave to file a short Sur-Reply (attached as Exhibit A) to address new arguments raised in Aon's Reply.

Dated: April 22, 2020

Respectfully Submitted,

**DEFENDANTS JON BURG, DANIEL  
COLEMAN, ELIZABETH STOUT, TYLER  
EVANS AND INFINITE EQUITY, INC.**

By: s/ Jeannil D. Boji  
One of Its Attorneys

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**CERTIFICATE OF SERVICE**

I, Jeannil D. Boji, certify that on April 22, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the parties listed below by operation of the Court's electronic filing system. Parties may also access this filing through the Court's ECF system.

By: /s/ Jeannil D. Boji